

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x

CHRISTINE CLARKSON,

Plaintiff,

08-CV-02503 ((TPG)(AJP)

-against-

RULE 7.1(a) DISCLOSURE

THE LONG ISLAND RAILROAD COMPANY,

Defendant.

----- x

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and to enable judges and magistrate judges of the court to evaluate possible disqualification or recusal, the undersigned counsel of record for Defendant states that Defendant is a New York State public benefit corporation organized under the laws of the State of New York. Defendant is a subsidiary of the Metropolitan Transportation Authority (“MTA”). Other subsidiaries of the MTA are MTA Metro-North Commuter Railroad, MTA New York City Transit, MTA Long Island Bus, and MTA Bridges and Tunnels.

Dated: Jamaica, New York

April 11, 2008



Karla R. Alston (KA6778)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

CHRISTINE CLARKSON,

Plaintiff,

08-CV-02503 ((TPG)(AJP)

-against-

ANSWER

THE LONG ISLAND RAILROAD COMPANY,

Defendant.

----- X

SIRS:

Defendant, The Long Island Rail Road Company ("LIRR"), by its attorney, MARK D. HOFFER, ESQ., answering the verified complaint of plaintiff, alleges, upon information and belief, as follows:

1. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "1" and refers all questions of law to the Court for its determination.
2. Denies the allegations contained in paragraph "5" but admits that on or about September 8, 2006 plaintiff was employed by the defendant.
3. Denies the allegations contained in paragraphs "7", "8", "9" and "10" of the plaintiff's complaint.

AS AND FOR AN AFFIRMATIVE DEFENSE

4. Whatever injuries and/or damages plaintiff may have sustained at the time and place alleged in the Complaint, were caused in whole or in part or were contributed to by the culpable conduct and negligence or fault or want of care on the part of the plaintiff, including

contributory negligence and without any negligence or fault or want of care on the part of this answering defendant, LIRR.

WHEREFORE, plaintiff demands judgment of this Court dismissing the plaintiff's complaint in its entirety, plus the costs and disbursements of the action.

Dated: Jamaica, NY
 April 10, 2008

Yours, etc.,

MARK D. HOFFER
Vice President/General Counsel & Secretary
Attorney for Defendant

By: Karla R. Alston
Karla R. Alston (KA6778)
Law Department - 1143
Jamaica Station
Jamaica, New York 11435
(718) 558-8478
File No.:JN-6383/L06000747

TO: SABLE & GOLD
Attorneys for Plaintiff
450 Seventh Avenue, Suite 1608
New York, NY 10123
Att: Frederic M. Gold